

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA )  
f/u/o KERRI ENTERPRISES, the ALLSTATE )  
COMPANY INC. a Massachusetts corporation )  
with a principal place of business )  
in Norwood, Norfolk County )

Plaintiff )

Civil Action No.05-CV-11339-NM

v. )

UNITED STATES FIDELITY & )  
GUARANTY COMPANY, a )  
Maryland surety company registered to )  
business in Massachusetts )

Defendant )

**AFFIDAVIT IN SUPPORT OF MOTION TO WITHDRAW**

I, Robert Philip Hilson, principal in the Law Offices of Robert Philip Hilson, having been duly sworn, do hereby state on oath as follows:

1. I am an attorney licensed to practice law in the Commonwealth of Massachusetts.
2. My office has represented the Plaintiff, Kerri Enterprises, the Allstate Company Inc., since the inception of this matter.
3. I, along with my associate, Rebecca L. Dalpe (who is no longer with my office), have filed an appearance on behalf of the Plaintiff in this action.
4. The Plaintiff has failed to meet its financial obligations to this office.
5. As a result thereof, there has been a breakdown in the relationship between this office and the Plaintiff.
6. Accordingly, I respectfully request that this Honorable Court grant my office leave to withdraw from representing the Plaintiff in this action.

Signed under the pains and penalties of perjury.

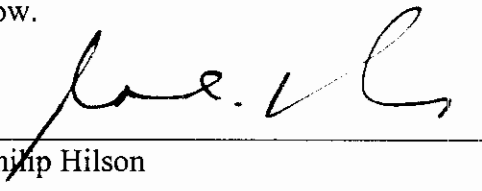
Date: 9.19.5

  
Robert Philip Hilson

CERTIFICATE OF SERVICE

I, Robert Philip Hilson, counsel to the Plaintiff herein, hereby certify that I serve a true copy of the within Affidavit in Support of Motion to Withdraw, upon Harvey B. Heafitz, Esq., Heafitz & Sullivan, 56 Chestnut Hill Avenue, Boston, MA 02135 and Arthur Tenaglia, All State Painting, 34 Day Street, Norwood, MA 02062, by first-class mail, postage prepaid, on the date set forth below.

Date: 9.19.5

  
Robert Philip Hilson

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